NPDES Inspection Report

Permit # WAR001234

Emerald Services

Tacoma, WA

September 29, 2016

Prepared by:

Matt Vojik
Environmental Protection Agency (EPA), Region 10
Office of Compliance and Enforcement (OCE)
Multimedia Inspection & RCRA Enforcement Unit (MIREU)

Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Greg Garman or from observations during the inspection.)

I. Facility Information

Facility Name:	Emerald Services, Inc.
Facility Owner/Operator:	Emerald Services, Inc.
Physical/Mailing Address:	1825 Alexander Ave. E., Tacoma, WA 98421
Lat/Long:	47.269584°, -122.391278°
NAICS Code:	562211 - Hazardous Waste Treatment and Disposal
Facility Contacts:	Greg Garman, Compliance Manager Office Phone: 253-533-6080 Cell Phone: 206-300-2101 Email: ggarman@emeraldrenews.com Jenki A. Caraballo, Facility Manager III Cell Phone: 206-491-2022 Email: jcaraballo@emeraldrenews.com
Permit Number:	WAR001234
Receiving Water:	Blair Waterway

II. Inspection Information

Inspection Date:	September 29, 2016
Inspectors:	Matt Vojik, Inspector EPA Region 10, OCE / MIREU Phone: 206-553-0716
Arrival Time:	10:00 AM
Departure Time:	1:15 PM
Weather:	Sunny

Purpose:	To determine whether the facility is in compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

This facility is permitted under the Washington State Department of Ecology (Ecology) Industrial Stormwater General Permit (ISGP) with the permit number WAR001234. The current permit became effective on January 2, 2015 and has an expiration date of December 31, 2019. According to Ecology's Water Quality Permitting and Reporting Information System (PARIS), the facility first obtained coverage on April 23, 1993.

The facility is also a permitted treatment storage and disposal facility (TSDF) of hazardous waste under the Resource Conservation and Recovery Act (RCRA ID# WAD981769110).

IV. Background

Emerald Services occupies 2.5 acres in Tacoma and receives shipments of hazardous waste via rail and tanker trucks. Primary industrial activities at the facility include:

- Solvent transfer, storage and recycling;
- Antifreeze transfer, storage and recycling;
- Oils and fuels storage and transfer;
- Used oil re-refining (since 2012);
- High Btu dangerous waste storage and fuel blending; and
- Other dangerous waste transfer and storage.

The facility manages three separate stormwater streams. Stormwater collected in the hazardous waste treatment and storage areas is discharged to the City of Tacoma's sanitary sewer system under the Industrial Wastewater Discharge Permit #TAC-013-2013. Stormwater collected in the used oil re-refining area is containerized and hauled to an off-site oily water treatment facility. Runoff from the remaining "stormwater management areas" drains to a detention vault and bioswale before discharging to the City of Tacoma's stormwater collection system.

The facility was operated by Sol-Pro from 1987 until it was purchased by Emerald in 2000. In 2016, Emerald was acquired by Safety-Kleen Systems, Inc.

The facility was last inspected for ISGP compliance on August 3, 2015 by Ecology. According to inspection reports, the past three Ecology inspections were in response to spills that occurred in the stormwater management areas from 2013 to 2015. According to PARIS, there have been no recent enforcement actions at this facility under the ISGP.

V. Inspection Chronology

This was an unannounced inspection. I arrived at the facility at 10:00am on September 29, 2016. I introduced myself to the receptionist, who contacted Mr. Greg Garman, Compliance Manager. I presented my credentials to Mr. Garman and provided him with an EPA Small Business Resources Information Sheet. I was accompanied throughout the inspection by Mr. Garman. I was not denied access to the facility.

I began the inspection with a brief opening conference with Mr. Garman in his office. After taking a tour of the facility, I conducted a records review. We ended with a closing conference to discuss observations and next steps.

VI. Opening Conference

Mr. Garman said that the facility has a workforce of 30-40 employees. At least two employees are on site 24 hour per day, 365 days per year. Emerald Services Inc. consisted of approximately 350 employees before being acquired by Safety-Kleen, which has a total workforce of approximately 15,000-16,000 employees. Mr. Garman said that he has been the compliance manager since November 2015. He said that the facility has not experienced any spills impacting the stormwater management areas since he has been at the facility.

VII. Site Review

Mr. Garman took me on a tour of the facility. A layout map appears in **Attachment A** and a photograph log appears in **Attachment B**.

Near the entrance to the facility, I observed stains on the pavement (**Photo 1**). Mr. Garman attributed these stains to leaks from a truck that had been scheduled for maintenance. He said that the industrial vehicle traffic at the facility consists of approximately 12 trucks per day. Mr. Garman said that the paved areas are swept with a street sweeper on a monthly basis.

Mr. Garman explained that the catch basins are equipped with normally closed gate valves so that any spills can be isolated before routing stormwater from the catch basins to the detention vault. During rain events, he said that staff open and close the valves on an hourly basis. Flow from the detention vault is then pumped to a bioswale (**Photo 2**) prior to discharge. Mr. Garman said that the detention vault is cleaned on an annual basis.

On the northeast side of the facility, I inspected the location of the last reported spill to a catch basin (**Photo 3**) in April 2015. Mr. Garman said that the spill resulted from an employee error that caused potable water to flood and overflow from a flare vent pipe. In this area, Mr. Garman also said that the facility periodically receives stormwater run-on from an unpaved Port of Tacoma property located northeast of the facility.

I also inspected the used oil re-refining facility (**Photo 4**) and rail car containment area, which are equipped with a separate containment vault. Stormwater from this area is hauled off-site for

treatment. The hazardous waste treatment and storage areas are equipped with blind sumps that collect stormwater before being pumped to a collection tank and then released in batches to the Tacoma sanitary sewer system.

The facility monitors the discharge on a quarterly basis for turbidity and oil sheen. Samples for turbidity are taken to Spectra Labs for analysis. Since the first quarter of 2015, sampling for other parameters has been suspended based on "consistent attainment" of benchmark values in accordance with Section S4.B.6. of the ISGP.

VIII. File Review

I reviewed the following records:

- Discharge Monitoring Reports (DMRs)
- Stormwater Pollution Prevention Plan (SWPPP), Revision 4.2, dated January 2015 (**Attachment C**)
- Summary of Monitoring Data from 2014 to 2016 (**Attachment D**)
- Monthly Inspections from 2014 to 2016
- Spill Logs from 2014 to 2016
- Training Records for 2016
- Chain of Custody Records and Analytical Reports from 2014 to 2016

Mr. Garman said that the facility had just undergone an environmental audit associated with Emerald's acquisition by Safety Kleen and he could not readily locate all requested documents at the time of the inspection. After the inspection on October 10, 2016, I received additional documents for review via email. Emailed documents have been saved to the CD in **Attachment C**.

IX. Areas of Concern

I noted the following areas of concern:

A. Magnesium Monitoring

Item 3 of Table 3 in Section S5.B. of the ISGP identifies magnesium as a sampling requirement applicable to RCRA TSDFs.

As indicated in Emerald's monitoring data (**Attachment D**), the facility has historically exceeded the magnesium benchmark of 64 ug/L with values ranging from 3,660 ug/L in the first quarter of 2014 to 10,400 ug/L in the first quarter of 2015. In 2011, Emerald submitted a request to Ecology for modification of permit coverage (**Attachment F**) to remove the magnesium benchmark as a monitoring requirement. In accordance with Section S8.D.5.c. of the ISGP, Ecology granted a "Level 3 Corrective Action waiver for magnesium" in the form of an administrative order (**Attachment F**).

After the inspection, I noted that the administrative order granted a waiver for level three corrective actions (treatment BMPs) specified under Section S8.D. of the ISGP, but the waiver does not explicitly remove the monitoring requirement for magnesium as the facility requested. According to the monitoring spreadsheet in **Attachment D**, the facility has claimed an exemption for magnesium monitoring and has not monitored for this parameter since the first quarter of 2015. Aside from the administrative order, it is unclear if the facility has made any other agreements with Ecology regarding the monitoring requirement for magnesium.

B. Accuracy of DMRs

DMRs have been certified to be "true, accurate, and complete" in accordance with Section S7.C.1.e. of the permit.

I noted that the facility's monitoring data (**Attachment D**) indicated that the discharge was monitored for turbidity during the second quarter of 2016, but the DMR for that period (**Attachment E**) reported "no discharge." Mr. Garman said this was probably the result of a miscommunication between him and Ms. Sheila Smith, who certifies the DMRs from Emerald's corporate office in Seattle. He speculated that he may have told her that there were no discharges during this period when he meant to say there were no spills. Mr. Garman said that he was awaiting his own DMR signatory authority from the new owners at the time of the inspection.

X. Closing Conference

I held a closing conference with Mr. Garman. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

Report Completion Date: _____

Lead Inspector Signature: _____

ATTACHMENT A – Facility Layout Map

ATTACHMENT B – Photograph Log

(Photographs were taken by Matt Vojik on September 29, 2016 with a Panasonic DMC-FH25 camera)

Photo 1 / P1020788 – Northerly view of stains on the pavement near entrance Gate 3

Photo 2 / P1020787 – Easterly view of the catch basin that functions as the stormwater sampling point. The bioswale appears in the background

Photo 3 / P1020793 – Northwesterly view of a catch basin (foreground) on the northeast side of the facility. On April 24, 2015 the facility reported that the catch basin received flow resulting from an employee error that caused potable water to flood and overflow from a flare vent pipe. A yellow arrow indicates the location of this vent pipe.

Photo 4 / P1020791 – Southwesterly view of the used oil re-refining facility. The rail car containment area appears on the left.

Complete list of photographs taken during the inspection:

- P1020784 – Normally closed shut off valve and rubber mat covering a catch basin located south of the main office
- P1020785 – View inside the catch basin located near entrance Gate 3
- P1020786 – Catch basin located near entrance Gate 3
- P1020787 – Easterly view of the catch basin that functions as the stormwater sampling point. The bioswale appears in the background
- P1020788 – Northerly view of stains on the pavement near entrance Gate 3
- P1020789 – Easterly view of the used oil re-refining facility
- P1020790 – Control panel for the pumps that deliver stormwater to the bioswale
- P1020791 – Southwesterly view of the used oil re-refining facility. The rail car containment area appears on the left.
- P1020792 – Westerly view of stormwater collection tank W-920 in the dangerous waste processing area.
- P1020793 – Northwesterly view of a catch basin on the northeast side of the facility. On April 24, 2015 the facility reported that the catch basin received flow from a spill that originated from the flare vent that appears in the background.
- P1020794 – Used oil samples stored in the container that appears in P1020795
- P1020795 – Container storing samples of used oil
- P1020796 – Summary spreadsheet of 2015 monitoring data

ATTACHMENT C – CD of Electronic Files

Contents:

- SWPPP Revision 4.2 dated January 2015
- Analytical Reports from the First Quarter of 2014 to the First Quarter of 2015
- Summary of Monitoring Data from 2014 to 2016
- Transmittal Email dated October 10, 2016

ATTACHMENT D – Summary of Monitoring Data from 2014 to 2016

ATTACHMENT E – DMR for the Second Quarter of 2016

ATTACHMENT F – Permit Modification Request & Magnesium Waiver from 2011